

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

JUDSON PORTNOY, On Behalf of All
Others Similarly Situated,

Plaintiffs,

v.

STONEMOR PARTNERS, L.P. ,
LAWRENCE MILLER, SEAN P.
MCGRATH, ROBERT B. HELLMAN, JR.
and TIMOTHY YOST

Defendants.

Class Action No. 2:16-cv-06111-ER

STEVE KLEIN, Individually and On Behalf
of All Others Similarly Situated,

Plaintiff,

v.

STONEMOR PARTNERS L.P.,
LAWRENCE R. MILLER, SEAN P.
MCGRATH, JAMES M. PIPPIS, TIMOTHY
K. MCGRATH, and WILLIAM R. SHANE,

Defendants.

Class Action No. 2:16-cv-06275-ER

**DECLARATION OF LEE ALBERT IN SUPPORT OF MOTION
OF ROBERT CRANDALL FOR CONSOLIDATION OF RELATED CASES,
APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF
LEAD COUNSEL FOR THE CLASS**

PURSUANT TO 28 U.S.C. §1746, I, Lee Albert, hereby declares as follows:

1. I am a partner at Glancy Prongay & Murray LLP, proposed Lead Counsel for the Class in these actions. I am admitted to and a member in good standing of the bars of the Supreme Court of the Commonwealth of Pennsylvania and the United States District Court for the Eastern District of Pennsylvania.

2. I submit this Declaration in support of the of motion Robert Crandall (“Movant”) for consolidation of the above captioned actions, to appoint him as Lead Plaintiff and to approve his selection of Lead Counsel for the Class.

3. Attached as Exhibits to this Declaration are true and correct copies of the following documents:

Exhibit A: Press release published November 21, 2016, on *PRNewsWire* announcing the pendency of the securities class action against Defendants herein: *Anderson v. StoneMor Partners, LP et al.*, Case No. 2:16-cv-06111-ER;

Exhibit B: PSLRA certification form of Movant;

Exhibit C: Loss chart of Movant;

Exhibit D: Firm résumé of Glancy Prongay & Murray LLP

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 20, 2017.

s/ Lee Albert
Lee Albert

PROOF OF SERVICE

I, the undersigned say:

I am not a party to the above case and am over eighteen years old.

On January 20, 2017, I served true and correct copies of the foregoing document, by posting the document electronically to the ECF website of the United States District Court for the Eastern District of Pennsylvania, for receipt electronically by the parties listed on the Court's Service List.

I affirm under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 20, 2017.

s/ Lee Albert
Lee Albert

Mailing Information for a Case 2:16-cv-06111-ER ANDERSON v. STONEMOR PARTNERS, L.P. et al

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

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Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)